



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 3, 2020

Hon. P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Parties to advise by July 21, 2020 any disputes over
defendants' document requests.

SO ORDERED.

Dated: 7/6/2020

P. Kevin Castel
United States District Judge

Re: *United States v. Humberto Rodriguez et al.*, 20 Cr. 301 (PKC)

Dear Judge Castel:

With the consent of defense counsel, the Government requests the opportunity to respond to the defendants' request for twenty-two categories of documents maintained by the Jury Administrator for the Southern District of New York and that the Court adjourn the previously-imposed July 14, 2020 deadline for the defense to submit their expert report.

On June 18, 2020, the defense requested that the Court order the Jury Administrator in this District to provide twenty-two categories of documents. (*See* Dkt. No. 22.) As the Court is aware, similar requests are pending in numerous cases in this District, and on June 30, 2020, in the case of *United States v. Balde*, 20 Cr. 281 (KPF), Judge Failla presided over a conference call with the Jury Administrator Linda Thomas. At the direction of the Court, counsel for the Government and the defendants in this case participated in the call. During that call, Ms. Thomas provided additional information about the existence and form of documents responsive to the defendants' requests. Judge Failla has ordered the parties in *Balde* to meet and confer about whether there is any dispute as to which documents requested by the defense should be produced, and to submit a joint status letter no later than July 14. Because the document requests in this case are nearly identical to those in *Balde*, the Government believes that any agreement reached in that case is likely to moot much if not all of any dispute in this case. Accordingly, the parties request that the Court set a July 21, 2020 deadline to notify the Court whether there is any dispute regarding the defendants' document requests and to propose a deadline for the defense to submit an expert report.

Respectfully submitted,

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cc (by ECF): all counsel